

NJID 186232

PHELAN HALLINAN DIAMOND & JONES, PC

400 Fellowship Road, Suite 100

Mt. Laurel, NJ 08054

856-813-5500

Attorneys for ROUNDPOINT MORTGAGE SERVICING CORP. SERVICER FOR QUEEN'S
PARK OVAL ASSET HOLDING TRUST

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:	: CHAPTER 7
LAURA L. DESCHAIINE	: CASE NO. 15-15679-GMB
Debtor	: NOTICE OF MOTION FOR
	: RELIEF FROM
	: STAY
LAURA L. DESCHAIINE	ROBERT MANCHEL, Esquire
263 CEDAR BRIDGE ROAD	1 EVES DR STE 111
MONROEVILLE, NJ 08343	MARLTON, NJ 08053
LAURA L. DESCHAIINE	Andrew Sklar, Trustee
125 W MONROE STREET,	1200 Laurel Oak Road, Suite 102
PAULSBORO, NJ 08066	Voorhees, NJ 08043

PLEASE TAKE NOTICE that on May 26, 2015, at 10:00 a.m. or as soon as counsel may be heard, the undersigned attorney for the secured creditor will move before the United States Bankruptcy Court, 400 COOPER ST, 4TH FLOOR, CAMDEN, New Jersey for an Order Vacating the Automatic Stay, with respect to property located at 125 W MONROE STREET, PAULSBORO, NJ 08066 and allowing the Attorney for ROUNDPOINT MORTGAGE SERVICING CORP. SERVICER FOR QUEEN'S PARK OVAL ASSET HOLDING TRUST to proceed with contractual remedies or other remedies that may be available under state law.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, the Movant will rely upon the Certification in Support and the proposed Order submitted herewith, as well as, oral arguments, if necessary. Pursuant to D.N.J. LBR 9013-2, Movant states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the

Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

Dated: April 24, 2015

/s/ Jennifer Gorchow

Jennifer Gorchow, Esq.

Phelan Hallinan Diamond & Jones, PC

400 Fellowship Road, Suite 100

Mt. Laurel, NJ 08054

Tel: 856-813-5500 Ext. 7649

Fax: 856-813-5501

Email: jennifer.gorchow@phelanhallinan.com